

KAREN A. CONNOLLY, LTD.

Karen A. Connolly
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146
Telephone: (702) 678-6700 Facsimile: (702) 678-6767

1 KAREN A. CONNOLLY
2 KAREN A. CONNOLLY, LTD.
3 6600 W. Charleston Blvd., Ste. 124
4 Las Vegas, NV 89146
5 Telephone: (702) 678-6700
6 Facsimile: (702) 678-6767
7 E-Mail: advocate@kconnollylawyers.com
8 Attorney for Defendant
9 JOHNNY LEE BASS

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 JOHNNY LEE BASS,

16 Defendant.

2:14-CR-00176-JAD-VCF-1

17 **DEFENDANT JOHNNY LEE BASS' UNOPPOSED MOTION TO CONDUCT A**
18 **PRE-PLEA PRE-SENTENCE INVESTIGATION REPORT AND PROPOSED ORDER**

19 COMES NOW the Defendant, JOHNNY LEE BASS, by and through his attorney of record,
20 KAREN A. CONNOLLY, of the law office of KAREN A. CONNOLLY, LTD., and hereby moves
21 this Honorable Court to order that a Pre-Plea Pre-Sentence Investigation Report be prepared by the
22 Probation Department to determine Defendant Bass' criminal history.

23 DATED this 2 day of October 2014.

24 KAREN A. CONNOLLY, LTD.

25 

26 KAREN A. CONNOLLY
27 6600 W. Charleston Blvd., Ste. 124
28 Las Vegas, NV 89146
Telephone: (702) 678-6700
Attorney for Defendant, JOHNNY LEE BASS

MEMORANDUM OF POINTS AND AUTHORITIES

STATEMENT OF FACTS

Defendant Bass is charged with one (1) count of Interference with Commerce by Robbery (Title 18, United States Codes, Section 1951) and two (2) counts of Bank Robbery (Title 18, United States Code, Section 2113).

A plea offer has been extended by the prosecutor, Assistant United States Attorney Sean C. Jones.

Mr. Bass is unsure of his prior convictions; however, he believes that his criminal history may be between categories IV - XVI, and may be a career offender.

The disparity in a potential sentence between the possible criminal history levels is substantial, and the ability to ascertain what possible sentence Mr. Bass may face impacts whether counsel can effectively advise him regarding his potential sentence.


The possible sentence to be faced by Mr. Bass will also strongly influence whether or not he accepts a plea negotiation in this case.

Undersigned counsel therefore respectfully requests an Order that the U.S. Department of Parole and Probation conduct a pre-plea pre-sentence investigation report to determine the Defendant's criminal history as soon as possible. Trial is schedule for November 14, 2014.

The undersigned has spoken with the prosecutor, Assistant United States Attorney Sean C. Jones, and he has no opposition to this request.

DATED this 2 day of October 2014.

KAREN A. CONNOLLY, LTD.



KAREN A. CONNOLLY
6600 W. Charleston Blvd., Ste. 124
Las Vegas, NV 89146
Telephone: (702) 678-6700
Attorney for Defendant, JOHNNY LEE BASS

KAREN A. CONNOLLY, LTD.

Karen A. Connolly
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146
Telephone: (702) 678-6700 Facsimile: (702) 678-6767

1 KAREN A. CONNOLLY
2 **KAREN A. CONNOLLY, LTD.**
3 6600 W. Charleston Blvd., Ste. 124
4 Las Vegas, NV 89146
5 Telephone: (702) 678-6700
6 Facsimile: (702) 678-6767
7 E-Mail: advocate@kconnollylawyers.com
8 *Attorney for Defendant*
9 **JOHNNY LEE BASS**

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHNNY LEE BASS,

Defendant.

2:14-CR-00176-JAD-VCF-1

ORDER

IT IS HEREBY ORDERED that the U.S. Department of Parole and Probation will prepare a Pre-Sentence Investigation Report of the Defendant Johnny Lee Bass.

DATED this _8th day of October, 2014.


UNITED STATES DISTRICT COURT JUDGE